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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

**ORIGINAL
FILE**

In the Matter of

Amendment of the Commission's Rules to
Establish New Personal Communications
Services

General Docket No. 90-314/
ET Docket No. 92-100
RM-7140, RM-7175, RM-7617, RM-7618
RM-7760, RM-7782, RM-7860, RM-7977
RM-7978, RM-7979, RM-7980

PP-35 through PP-40,
PP-79 through PP-85

REPLY COMMENTS OF

ILLINOIS CONSOLIDATED TELEPHONE COMPANY

Illinois Consolidated Telephone Company ("ICTC") respectfully submits its Reply Comments in the proceeding referenced above.^{1/} ICTC is a medium-sized local exchange carrier ("LEC") serving 80,651 access lines in Central Eastern Illinois. ICTC is vitally interested in the Commission's proposals for launching Personal Communications Service ("PCS") because they will affect ICTC's provision of local exchange service and impact the manner in which its service can be delivered. ICTC and the local exchange industry, can be significant components in deploying PCS to the public and meeting the Commission's goals of universality, speedy deployment, service diversity and competitive delivery.^{2/}

^{1/} Notice of Proposed Rulemaking and Tentative Decision, 7 FCC Rcd 5676 released August 14, 1992. ("NPRM").

^{2/} NPRM at ¶ 6.

ARGUMENT

I. LEC's SHOULD BE ENCOURAGED TO PROVIDE PCS BY THE COMMISSION'S REGULATORY STRUCTURE

The Commission has tentatively concluded that LECs should be allowed to provide PCS within their service areas, noting the benefits of such an approach.^{3/} ICTC agrees that the efficiencies noted by the Commission will follow LECs' entry into PCS, but ICTC requests that a full allocation of spectrum be provided to LECs, rather than the 10 MHz proposed.^{4/} ICTC supports USTA's proposed framework of five licensed channel sets of 20 MHz each.^{5/}

It is also essential that LECs be eligible for a PCS license regardless of its ownership of a minority interest in a cellular market. Minority interests held by LECs are no threat to competitive provision of PCS since that ownership interest does not provide the minority owner with any preferential access to resources of the cellular entity.

LEC involvement in PCS is a natural progression of the ongoing use of new and efficient technology in the provision of local exchange service. In evolving from analog to digital technology and fiber optic cable from copper wire, LEC's have brought consumers more efficient, higher quality service and PCS is the logical extension of that continued strategy.

The Commission can also foster LEC entry into PCS by adopting the USTA approach to establishing a PCS licensee's area. USTA proposes to use MSAs and RSAs as the geographic

^{3/} NPRM at ¶ 75.

^{4/} NPRM at ¶ 77.

^{5/} USTA Comments at 30.

licensing area for PCS.^{9/} ICTC as one of five PCS licensees, should be assured of an opportunity to offer PCS within its exchanges which are all with RSAs. Rural areas, such as those served by ICTC, require advanced telecommunications services to keep pace with urban areas and remain viable areas in which businesses can locate or continue without disadvantage. Given the more lucrative appeal of urban areas for the introduction of PCS, these rural areas will not experience the speedy deployment of PCS desired by the FCC, unless the LEC in that area can take part.

II. THE COMMISSION SHOULD ESTABLISH A NATIONAL LICENSE APPROACH WHICH ASSURES SMALLER AND MID-SIZED LEC PARTICIPATION IN PCS.

There are economic benefits of LEC participation in providing PCS - fuller utilization of the public switched network, expertise in billing, database handling and switching or transmission plus the ability to acquire the capital necessary to deploy PCS. ICTC therefore supports full LEC participation in PCS as described in the previous section. So long as all mid-sized and smaller LECs are assured that they will be allowed to offer PCS in the areas in which they provide local exchange service, ICTC also supports a separate national license for PCS.

A national license in which LECs are allowed to jointly participate in offering PCS can potentially offer the advantages any LEC can bring to PCS, only on a larger scale. By advantageous integration of existing infrastructure into a PCS offering, many costs, (e.g. new switches) can be avoided. Aggregating the expertise and infrastructure of many LECs has the

^{9/} USTA comments at 19. Other commenters supporting the use of cellular MSAs and RSAs include BellSouth, Southwestern Bell, McCaw Cellular, CTIA, GTE and Sprint.

potential to lower cost, which furthers the universality of PCS, increasing the likelihood for development of a common technical standard and hastening delivery of PCS. ICTC supports the selection of a national license using the comparative hearing approach incorporating strict eligibility requirements and time constraints in which systems are required to be built. ICTC endorses the information and filing requirements for comparative hearings as proposed by USTA.^{2/}

CONCLUSION

ICTC and other exchange carriers must be provided the opportunity to offer PCS in their service areas. If the Commission assures such LEC participation, the expected benefits can be intensified by also allowing a national license in which those LECs can actively take part.

Respectfully submitted,


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^{2/} USTA Comments at 27-28.

CERTIFICATE OF SERVICE

I, Michelle V. Richardson, do certify that on January 8, 1993, copies of the foregoing Reply Comments of Illinois Consolidated Telephone Company, were either hand delivered, or sent U.S. Mail, first-class, postage prepaid to the persons listed on the attached Service list.


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